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*Attorneys for True Names, Ltd. and Virgil Griffith*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

True Names, Ltd. d/b/a Ethereum Name  
Service, a Singapore corporation, and Virgil  
Griffith, an individual,

Plaintiffs,

v.

GoDaddy, Inc., a Delaware corporation,  
and GoDaddy.com LLC, a Delaware  
corporation, Dynadot LLC, a California  
corporation, and Manifold Finance, Inc., a  
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS  
GODADDY, INC., GODADDY.COM  
LLC, AND DYNADOT LLC TO  
ANSWER OR RESPOND TO THE  
AMENDED COMPLAINT (Third  
Request)**

This action was filed by Plaintiffs True Names, Ltd., and Virgil Griffith  
("Plaintiffs") on September 5, 2022. (*See* Dkt. No. 1 ("Complaint")).

Plaintiffs served the summons and Complaint on Defendants GoDaddy, Inc.,  
GoDaddy.com LLC, on Manifold Finance, Inc. on September 6, 2022, and on Dynadot  
LLC on September 7. (*See* Dkt. Nos. 12, 13, 14, and 15).

Plaintiffs then filed an amended complaint on September 21, 2022. (*See* Dkt. No.  
24 ("Amended Complaint")). Plaintiffs served the summons and Amended Complaint on  
Defendants GoDaddy, Inc. and GoDaddy.com LLC on September 26, 2022, on Dynadot,

1 LLC on September 29, 2022, and on Manifold on September 23, 2022. (*See* Dkt. Nos.  
2 30, 31, 32, and 33).

3 GoDaddy, Inc., GoDaddy.com LLC, and Dynadot, LLC (the “Stipulating  
4 Defendants”) and Plaintiffs (collectively, the “Parties”) previously stipulated to two  
5 extensions of the deadline for the Stipulating Defendants to answer or respond to the  
6 Amended Complaint, which the Court subsequently granted (Dkt. Nos. 35, 41). Since  
7 the Court granted the Parties’ previous requests to extend this deadline, the Parties have  
8 continued to engage in discussions to work towards a potential resolution of this matter.  
9 The Parties have since agreed to an additional extension of time to answer or respond to  
10 the Amended Complaint until **December 12, 2022**.

11 Good cause exists for this stipulated extension of time in order to afford the Parties  
12 additional time to work towards a potential resolution of the instant dispute, and thereby  
13 potentially avoid unnecessary motion practice and preserve judicial resources. No other  
14 deadlines will be affected by this stipulated extension. This is the Parties’ third request  
15 for an extension concerning this matter.

16 Accordingly, for the reasons presented herein, the Parties respectfully request that  
17 the Court enter an order extending the deadline for Defendants GoDaddy, Inc.,  
18 GoDaddy.com LLC, and Dynadot, LLC to answer or respond to the Amended Complaint  
19 to **December 12, 2022**. A proposed order consistent with the relief requested herein is  
20 submitted concurrently herewith.

21 Executed in San Francisco, California, on this 9th day of November 2022.

22 /s/ Katie Lee  
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